

Remarks

In the Office Action of November 9, 2004, the Examiner rejected claim 28 under 35 U.S.C. § 101 and 35 U.S.C. § 112, first paragraph. Additionally, the Examiner rejected claims 1-28 under 35 U.S.C. § 103(a) as being unpatentable over either of U.S. Patent Application Publication 2002/0078035 to Frank et al. ("Frank") or U.S. Patent Application Publication 2001/0049677 to Talib et al. ("Talib").

Applicant would like to thank the Examiner for conducting an interview with Applicant's representative on January 25, 2005. In the interview, Applicant's representative requested clarification on the rejection under 35 U.S.C. § 103(a). In particular, in the rejection under 35 U.S.C. § 103(a), the Examiner made a number of broad characterizations upon which Applicant requested clarification. For example, the Examiner states that "from the breadth, nonspecific and ambiguous language of the claims, they appear to be anticipated by most of the prior art cited of record," and "the nature of the claim language appears to be possibly misdescriptive or misleading in the actual nature or intent of the invention." (Office Action, numbered paragraph 4).

When asked to clarify this language, the Examiner repeatedly stated that one point of misdescription was the claim language relating to "intersections" of "rows." The Examiner stated that by definition, rows in a table cannot intersect. In response, Applicant's representative explained that the claims, such as claim 1, do not recite intersections of rows but intersections of sets of rows. As a simple example of this, consider a table with five rows labeled row one through five. Although the individual rows do not intersect, if one were to define a first set

of rows as rows one through three and a second set of rows as rows three through five, an intersection operation could be taken over these two sets of rows to obtain the intersecting row three.

Additionally, in the interview, Frank and Talib were generally discussed with respect to the claims. Although the Examiner did not point to any specific sections of these references, the Examiner continued to maintain that the claims are not patentable in view of Frank or Talib. No agreement was reached with regard to the allowability of the claims.

By this Amendment, Applicant has amended claims 1, 4, 5, 7, 8, 10, and 12 to improve form and canceled claims 2 and 28 without prejudice or disclaimer. Additionally, claims 29 and 30 have been newly added. In view of the cancellation of claim 28, Applicant submits that the rejection of this claim under 35 U.S.C. §§ 101, 112, and 103 has been obviated.

*Rejection of Claims 1-20 Based on Frank or Talib*

Claims 1-20 were rejected under 35 U.S.C. § 103(a) based on Frank or Talib. For the following reasons, Applicant respectively traverses.

Applicant initially notes that in making the rejection under 35 U.S.C. § 103(a), at page three of the Office Action, the Examiner variously refers to claims 1-27 as nonspecific, ambiguous, misdescriptive, and misleading. Applicants strongly disagree with the Examiner, and as stated in the interview, Applicant believes that the claims are clear and definite and in full compliance with 35 U.S.C. § 112, first and second paragraphs. If the Examiner continues to believe that any of the claims are nonspecific, ambiguous, misdescriptive, or misleading,

Applicant requests that the Examiner specifically point out the particular language of these claims that is nonspecific, ambiguous, misdescriptive, or misleading, and the reason why this language is nonspecific, ambiguous, misdescriptive, or misleading.

Claim 1, as amended, is directed to a method for generating geographic coordinate information. The method includes receiving a plurality of address terms. The method further includes identifying, in a table that includes a plurality of rows that each include a plurality of address fields, an intersection of a plurality of sets of rows defined based on the plurality of address terms, the plurality of address terms corresponding to the address fields. The method also includes reading geographic coordinate information from the table at the intersection of the plurality of sets of rows in the table.

Applicant submits that neither Frank nor Talib discloses or suggests the features recited in claim 1.

Frank is directed to a search system that presents a map interface to a user. (See Frank, paragraphs 0005 and 0006). A user may pose a query to the map interface and receive a representation of the query results arranged on the map as icons. (Id.). The query results include documents such as text-based files. (Id.). Frank additionally discloses that documents are initially associated with spatial locations using a document ranking process that assigns a spatial relevance score to each document. (Frank, paragraphs 0009 and 1010).

Although Frank may generally relate to geographic coordinate information, such as by assigning geographic measurements such as latitude or longitude to documents, (Frank, paragraph 0055), Frank in no way discloses or suggests the

specific techniques recited in claim 1 for generating geographic coordinate information. More specifically, claim 1 recites identifying, in a table that includes a plurality of rows that each include a plurality of address fields, an intersection of a plurality of sets of rows defined based on the plurality of address terms, the plurality of address terms corresponding to the address fields. Frank in no way discloses or suggests any such technique for accessing a table. Frank, for example, does not disclose or suggest a table as recited in claim 1, does not disclose or suggest the plurality of sets of rows in the table recited in claim 1, nor does Frank disclose or suggest identifying an intersection of the plurality of sets of rows, as is also recited in claim 1.

Talib, as with Frank, does not disclose or suggest the features recited in claim 1. Talib is generally directed to searching a document archive in a manner that it is easy to search, drill down, drill-up, and drill-across documents in an archive. (Talib, Abstract). Talib provides for, among other things, the presentation of categorized search results, which allows “an enormous database to be represented by a very small footprint.” (Talib, paragraph 41).

The Examiner does not specifically point to any specific section of Talib as disclosing the features of claim 1. Applicant will nevertheless explain why that Talib does not disclose or suggest the features of claim 1. As with Frank, Talib does not disclose or suggest a table as recited in claim 1, does not disclose or suggest the plurality of sets of rows in the table recited in claim 1, nor does Talib disclose or suggest identifying an intersection of the plurality of sets of rows, as is also recited in claim 1.

In rejecting the claims, the Examiner does not point to any specific sections of Frank or Talib as corresponding to any feature of claim 1. The Examiner instead broadly characterizes Frank and Talib as teaching the “gist of the invention,” and then appears to contend that there are “some minor additional limitations that are met either by inherency of the teachings of these references [Frank or Talib] or dependent upon how one gives meaning to the nebulous claim language.” (Office Action, page 4). Applicant submits that this type of broad characterization of obviousness is insufficient to establish a *prima facie* case of obviousness under 35 U.S.C. § 103(a). Indeed, the MPEP specifically cautions against distilling an invention down to its “gist” or “thrust,” as this type of analysis disregards the requirement of analyzing the subject matter “as a whole.” MPEP 2141.02. In the instant case, not only has the Examiner improperly attempted to distill the invention down to its gist, but the Examiner never clearly states what he is considering to be the gist of the invention. If the Examiner maintains the rejections under 35 U.S.C. § 103(a), Applicant requests that the Examiner specifically state which features of the claims the Examiner believes are disclosed by Frank or Talib and which features of the claims the Examiner believes are “the minor additional limitations” that the Examiner contends are inherent.

For at least these reasons, Applicant submits that claim 1 is not disclosed or suggested by Talib or Frank and the rejection of this claim should be withdrawn. Claims 3-11 depend, either directly or indirectly from claim 1, and the rejections of these claims should similarly be withdrawn.

Independent claim 12, as amended, recites features similar to claim 1. Accordingly, the rejection of this claim and its dependent claim 13 should also be withdrawn.

Independent claim 14 is directed to a system for geocoding postal addresses. The Examiner does not specifically address claim 14 or its dependent claims 15-20. Applicant submits that neither Frank nor Talib disclose or suggest features of these claims. Neither reference discloses, for example, a table including a plurality of rows that each correspond to a range of one or more addresses, each of the rows including a plurality of fields that define the row, or a geocoding component configured to generate geographic coordinate information for a received address specified by one or more terms that correspond to the fields by locating at least one row in the table that corresponds to an intersection of a number of sets of rows defined by the terms in the received address, as required by claim 14. Accordingly, the rejection of claims 14-20 should be withdrawn.

*Rejection of Claims 21-28 Based on Frank and Talib*

Claims 21-28 were also rejected under 35 U.S.C. § 103(a) based on Frank or Talib.

Independent claim 21 is directed to a method for extracting addresses from a document. The method includes identifying possible address terms based on predetermined rules, verifying that the identified possible address terms are address terms by comparing the address terms to a table containing known addresses, and examining a relative position of the verified possible address

terms in the document to determine whether the verified possible address terms form a valid address. The Examiner does not specifically address the features of claim 21 or its dependent claims 22-26. Applicant submits that neither Frank nor Talib disclose or suggest features of these claims.

Applicant notes that Frank, at paragraphs [0118] through [0137] discusses a “spatial recognizer,” which “finds candidate spatial data in unstructured text.” (Frank, paragraph [0119]). The spatial recognizer of Frank, however, does not disclose or suggest the method recited in claim 21. Accordingly, the rejection of claims 21-26 should be withdrawn.

Independent claim 27 recites features similar to those recited in claim 21. Based on similar rationale, Applicants submit that claim 27 is also not disclosed or suggested by Frank or Talib.

#### *Other General Allegations in Office Action*

On pages 5 and 6 of the Office Action, the Examiner includes a number of broad allegations that the claims are generally obvious, inherent, or well known in the art. Applicant strongly disagrees with these allegations, and requests that if the Examiner persists in maintaining them, that the Examiner specifically point to a prior art reference disclosing each of the features that the Examiner believes to be inherent or well known.

For example, the Examiner states that “whether a data field text is capitalized or not is something databases designers would routinely consider to include or not as a potential search field criteria, just as in any word processing or search string database system.” (Office Action, page 5). Although not

explicitly stated in the Office Action, the Applicant assumes that the Examiner is referring to dependent claim 23, which recites that “predetermined rules include a comparison of capitalization in the possible address terms to capitalization consistent with actual address terms.” The predetermined rules recited in claim 23 refer to “identifying possible address terms based on predetermined rules,” as recited in independent claim 21. Applicant submits that it is unclear how this feature, which further defines predetermined rules used to identify possible address terms, is related to, as the Examiner states, “potential search field criteria, just as in any word processing or search string database system.” The Examiner appears to be mis-characterizing the recitations of this claim.

At the sentence bridging pages 5 and 6 of the Office Action, the Examiner states “[a]nother example of inherency is the use of parity upon data for validation purposes, as storage of data in memories and databases within computerized systems inherently make use of parity either in the memory storage fields/elements and/or the database fields themselves.” Although not stated by the Examiner, Applicant assumes that the Examiner is referring to dependent claim 17, which is the only claim that recites the word parity. This claim, in conjunction with claim 16, further defines the fields that are included in one of the plurality of rows recited in claim 14. The fields recited in claim 17 (and claim 16, from which claim 17 depends), include: a state field, a zip code field, a street field, a county field, a city field, a street base name field, and a parity field. The Applicant does not dispute that the concept of parity is generally known in the art, however, claim 17 does not simply recite “parity,” it recites a parity field in combination with a number of other fields in a table. Additionally, as used in the



context of the present application, parity refers to address parity, not parity for general validation purposes. None of the references cited by the Examiner disclose or suggest any such combination of fields.

At page 6 of the Office Action, the Examiner gives additional examples of inherency as the “omissions of 'prefixes and suffixes'” and the “concept of 'verification'”. Although not explicitly stated by the Examiner, these allegations appear to relate to claims 21-27. Applicant submits that the Examiner appears to be improperly picking phrases from the claims and analyzing the phrases rather than the claim as a whole. Although independent claims 21 and 27, for instance, do involve “verification,” the claim as a whole recites significantly more than just “the concept of verification.” Claim 21, for instance, is directed to a method for extracting addresses from a document, and includes identifying possible address terms based on predetermined rules, verifying that the identified possible address terms are address terms by comparing the address terms to a table containing known addresses, and examining a relative position of the verified possible address terms in the document to determine whether the verified possible address terms form a valid address. Neither Frank nor Talib, either alone or in combination, disclose or suggest the features of claim 21. The Examiner's broad allegations that select terms or phrases in a claim are inherent in no way forms a proper *prima facie* case of obviousness regarding claim 21 or any of the other pending claims.

*New Claims 29 and 30*

New claim 29 depends from claim 1. At least by virtue of the dependency of this claim from claim 1, Applicant submits that the rejection of this claim is improper and should be withdrawn. New claim 30 includes certain features similar to those recited in claims 1 and 21. Applicant submits that, for reasons similar to those given above, claim 30 is also not disclosed or suggested by the cited prior art.

For at least the foregoing reasons, Applicant respectfully requests the reconsideration of this application and the allowance of the pending claims.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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